

- c) writing, into the memory of said participant computer equipment item, at least one association between a computer equipment identifier and a behavior identifier and, in order to execute this interactive dialogue, when this participant computer equipment item and at least one reciprocal participant computer equipment item are in each other's presence;
- d) carrying out a procedure of authentication between said participant computer equipment item and said reciprocal participant computer equipment item, and
  - searching for the identifier of the authenticated reciprocal participant computer equipment item in said list of identifiers;
  - reading said associated behavior identifier; and
  - applying, at the participant computer equipment item, a behavior relative to the authenticated reciprocal participant computer equipment item, this behavior being selected as a function of the result of the authentication procedure and associated with the behavior identifier and with the identifier of the reciprocal participant computer equipment item.  
(emphasis added)

As explained in the present application, these features overcome drawbacks of the prior art and, particularly, allow adaptation of the behavior of the equipment items when interacting (i.e., in an interactive dialogue).

As discussed below, it is respectfully submitted that Urien does not teach the elements of steps a), c), and d), as alleged, and that Maillard does not teach the elements of step b), as alleged.

First, with respect to the elements of step a), it is alleged in the Office Action that "Urien discloses ... writing, into said participant equipment item, a list of reciprocal participant equipment identifiers (column 9, lines 46-63)." (Office Action, page 3.)

Column 9, lines 46-63 of Urien disclose a first layer essentially comprising a software multiplexer that enables the exchange of information between a smart card

and a host terminal, in the form of protocol data units. A link between an agent of the terminal and an agent of the smart card allows bi-directional data exchange between the agents.

It is respectfully submitted that the cited portion of Urien does not disclose writing, into a memory of a participant computer equipment item, a list of reciprocal participant computer equipment identifiers, as recited in claim 1, because it contains no disclosure of a list of reciprocal participant computer equipment identifiers.

Further, with respect to the elements of step b), it is acknowledged in the Office Action that "Urien fails to disclose a list of behavior identifiers." (Office Action, page 4.) Nonetheless, it is contended in the Office Action that Maillard discloses a "smart card for use with a receiver of encrypted broadcast signals, and receiver comprising a list of behavior identifiers, said behaviors being relevant in said interactive dialogue (paragraph 0053)." (Office Action, page 4.) This contention is respectfully traversed.

Maillard relates to a smartcard for use with a receiver of encrypted broadcast signals in a broadcast and reception system, a receiver / decoder for receiving and decrypting broadcast signals, an apparatus for broadcasting encrypted signals and a method of broadcasting encrypted signals (Maillard, paragraph [0001]). Paragraph [0053] of Maillard is reproduced below:

In a tenth aspect, the present invention provides a smartcard for use in a receiver/decoder as described above, said smartcard including a memory containing a list of IDs of respective receiver/decoders with which it may operate and indications as to whether the smartcard may operate with each of said listed receiver/decoders.

Without conceding the propriety of combining Urien and Maillard references, and reading the "list of ... indications as to whether the smartcard may operate with each of

said listed receiver/decoders” as a “list of behavior identifier,” it is respectfully submitted that Maillard does not teach the elements of step b), as recited in claim 1.

As used in claim 1, the term “behavior identifier” is: (1) a part of a list written into the memory of the participant computer equipment item, (2) associated with a computer equipment identifier, and (3) applied to the participant computer equipment item as a result of an authentication procedure of a reciprocal participant computer equipment item.

However, Maillard describes in paragraph [0292] that the “indications” as to whether the smart card may operate with each of the listed receiver / decoders are either a “level ‘1’ or ‘0’.” Paragraph [0292] also describes that a program in the receiver / decoder searches for the ID of the receiver / decoder in the memory of the smart card, and if the associated “indication” is a “1,” then the smart card is “enabled”; if not, the smart card will not function with that receiver / decoder.

Initially, considering the “indications” of “0” and “1” described in Maillard as “behavior identifiers,” it is respectfully submitted that listing the ID’s of multiple receiver / decoders with such Boolean indicators cannot be equated to an association between a computer equipment identifier and a behavior identifier.

Further, the “indications” (read as “behavior identifier”) stored on the “smart card” (read as “participant computer equipment item”) of Maillard, in fact, are applied to the behavior of the “receiver / decoder” (read as “reciprocal participant computer equipment item”) and not to the behavior of the “smart card” (read as “participant computer equipment item”), as recited in claim 1. In other words, in Maillard, the receiver / decoder (read as “reciprocal participant computer equipment item”) reads the “behavior

identifier” associated to its own ID in the smart card (read as “participant computer equipment item”) to modify its own behavior (i.e., the behavior of the reciprocal participant computer equipment item is modified); whereas, as recited in claim 1, the behavior identifier is used to modified the behavior of the participant computer equipment item in interacting with the reciprocal participant computer equipment item following authentication of the reciprocal participant computer equipment item.

In the instant invention, two connected equipment items (a “participant equipment item” and a “reciprocal participant computer equipment item”) being undifferentiated, a terminal connected to a card contains itself a list of card identifiers, a list of behaviors (of the terminal itself) and at least an association between a card identifier and a behavior identifier. When the terminal is connected to a card, it authenticates itself with the card, searches for the identifier of the card in the list of card identifiers that it stores, reads the behavior identifier associated in its own memory to that card identifier, and follows that behavior with the card, according to the authentication result.

Thus, the elements of step b) of claim 1 are not disclosed in either Maillard or Urien.

Further, with respect to the elements of steps c) and d) of claim 1, it is respectfully submitted that since it is acknowledged that Urien fails to disclose a list of behavior identifiers (or, more accurately, writing into a memory of a participant computer equipment item a list of behavior identifiers), that Urien cannot and does not reasonably then disclose the elements of steps c) and d) of claim 1 which specifically reference such behavior identifiers of the list of behavior identifiers of step b) of claim 1.

Still further, with respect to the elements of step d) of claim 1, in particular, it is alleged in the Office Action that “Urien discloses ... carrying out a procedure of authentication between said participant equipment item and said reciprocal participant equipment item, and ... applying, at the participant equipment item, a behavior relevant to the authenticated reciprocal participant computer equipment item, this behavior being selected as a function of the result of the authentication procedure and associated with behavior identifier and with the identifier of the reciprocal participant equipment item (column 5, line 57 – column 6, line 5).”

Column 5, line 57 through column 6, line 5 of Urien discloses a “disymmetrical communication protocol” wherein a data stream is subdivided into a first, low-speed stream which passes directly via a smart card, and a high-speed stream which passes via a terminal.

It is respectfully that the cited portion of Urien cannot be equated to carrying out a procedure of authentication between said participant equipment item and said reciprocal participant equipment item, and ... applying, at the participant equipment item, a behavior relevant to the authenticated reciprocal participant computer equipment item, this behavior being selected as a function of the result of the authentication procedure and associated with behavior identifier and with the identifier of the reciprocal participant equipment item. Further, it is also respectfully submitted that the elements of step d) of claim 1 are not disclosed by Maillard.

Thus, it is respectfully submitted that the method of claim 1 is not disclosed by either Urien or Maillard, however combined, and that claim 1 is allowable over the cited references.

Independent claim 22 recites “a list of behavior identifiers defined in an interactive dialogue.” For at least the reasons discussed above with respect to claim 1, it is respectfully submitted that the combination of Urien and Maillard does not disclose the invention as recited in claim 22.

Claims 2 – 14 depend from claim 1, and claims 23 – 24 depend from claim 22, and are allowable for at least the reasons provided in support of the allowability of claim 1 and claim 22.

**2) Claims 15 – 16 and 18 – 21:**

Claims 15 – 16 and 18 – 21 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Urien in view of Maillard and in further view of Alve et al. (US 2003/0196089 A1) (“Alve”). This rejection is respectfully traversed.

Claims 15 – 16 and 18 – 21 depend from independent claim 1. It is respectfully submitted that Alve does not provide a disclosure that remedies the deficiencies of Urien and Maillard as discussed above, and, therefore, that claims 15 – 16 and 18 – 21 are allowable for at least the reasons provided in support of the allowability of claim 1.

**3) Claim 17:**

Claim 17 has been rejected under 35 U.S.C. 103(a) as being unpatentable over Urien in view of Maillard in further view of Alve and in further view of Arkin et al. (US 2002/0152262 A1) (“Arkin”). This rejection is respectfully traversed.

Claim 17 depends from independent claim 1. It is respectfully submitted that Arkin also fails to provide a disclosure that remedies the deficiencies of Urien, Maillard, and Alve as discussed above, and, therefore, that claim 17 is allowable for at least the reasons provided in support of the allowability of claim 1.

Allowance of the application in its present form is respectfully solicited.

Date: April 30, 2009

Respectfully submitted,



---

By: Jeffrey A. Haeberlin  
Registration No.: 40,630

**STITES & HARBISON PLLC** ♦ 1199 North Fairfax St. ♦ Suite 900 ♦ Alexandria, VA 22314  
TEL: 703-739-4900 ♦ FAX: 703-739-9577 ♦ CUSTOMER NO. 000881